

Gregory S. Powell, Assistant United States Trustee  
State Bar No. 182199

Jared A. Day, Trial Attorney  
State Bar No. 275687

Phillip J. Shine, Trial Attorney  
State Bar No. 318840

Deanna K. Hazelton, Trial Attorney  
State Bar No. 202821

**UNITED STATES DEPARTMENT OF JUSTICE**

Office of the United States Trustee  
450 Golden Gate Avenue, Room 05-0153  
San Francisco, California 94102  
Phone: (775) 784-5530  
Email: [jared.a.day@usdoj.gov](mailto:jared.a.day@usdoj.gov)

Attorneys for Peter C. Anderson  
United States Trustee for Region 17

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SANTA ROSA DIVISION**

In re:

LeFever Mattson, a California Corporation et  
al.,<sup>1</sup>

Debtor.

Case No. 24-10545 CN

Chapter 11

Date: July 18, 2025  
Time: 11:00 a.m.

**UNITED STATES TRUSTEE'S STATEMENT AND NOTICE OF  
VOLUNTARY REDUCTIONS REGARDING PENDING  
INTERIM APPLICATIONS FOR COMPENSATION**

Peter C. Anderson, United States Trustee for Region 17 (United States Trustee”), by and  
through his undersigned counsel, hereby files this *Statement and Notice of Voluntary Reductions*

<sup>1</sup> The last four digits of LeFever Mattson’s tax identification number are 7537. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://veritaglobal.net/LM>.

1 *Regarding Pending Interim Applications for Compensation* (the “Applications”) in the above-  
2 captioned case.

3 In support, the United States Trustee respectfully represents as follows:

4 **A. General Case Background**

5 1. On September 12, 2024, several of Debtors commenced the above-captioned  
6 cases by filing voluntary petitions (“Petitions”) for relief under chapter 11 of the Bankruptcy  
7 Code.<sup>2</sup> *See* ECF No. 1 for each case.

8 2. The United States Trustee appointed the Official Committee of Unsecured  
9 Creditors (“OCUC”) in these cases on October 9, 2024, as amended on November 25, 2024. *See*  
10 ECF Nos. 135 *and* 368.

11 3. The 11 U.S.C. § 341(a) meetings of creditors were concluded on December 2,  
12 2024. *See* ECF Dockets *generally*.

13 **B. The Pending Interim Applications for Compensation**

14 4. The fee applicant bears the burden of proof to show entitlement to the requested  
15 fees under 11 U.S.C. § 330. *See In re Eliapo*, 298 B.R. 392, 402 (B.A.P. 9th Cir. 2003), *rev’d in*  
16 *part on other grounds*, 468 F.3d 592 (9th Cir. 2006); *In re Ginji Corp.*, 117 B.R. 983, 990  
17 (Bankr. D. Nev. 1990) (“[t]he applicant ... has the burden of proof to show the reasonableness of  
18 the fees sought”).

19 5. Interim fee awards are always subject to reexamination during a bankruptcy  
20 case. *See In re Strand*, 375 F.3d 854, 858 (9th Cir. 2004). These Interim fee awards are  
21

22  
23  
24 \_\_\_\_\_  
25 <sup>2</sup> Debtor Windscape Apartments, LLC 24-10417 was the first of Debtors to file its voluntary  
26 chapter 11 petition on August 6, 2024. Debtors Pinewood Condominiums, LP 24-10598 and  
27 Ponderosa Pines, LP 24-10599 filed their voluntary chapter 11 petitions on October 2, 2024.  
28 These three Debtors along with those additional Debtors that filed their voluntary chapter 11  
Petitions on September 12, 2024 are referred to herein collectively as “Debtors.”

1 subject to final approval of the Bankruptcy Court, and the United States Trustee reserves his  
2 rights accordingly.

3         6.       The United States Trustee has reviewed the Applications and raised issues with  
4 the Applicants regarding their interim fee requests.<sup>3</sup> As set forth below, the Applicants have  
5 provided the United States Trustee with additional information and agreed to reduce their first  
6 interim compensation requests prior to the above-captioned hearings.

7  
8         7.       Debtors' general bankruptcy counsel, Keller Benvenuti Kim LLP, has  
9 consented to a voluntary reduction of \$12,423.75 in legal fees to address various legal service  
10 descriptions that the United States Trustee identified as, *inter alia*, potentially duplicative,  
11 vague, non-compensable clerical overhead, and excess hearing and conference attendance. *See*  
12 *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses*  
13 *Filed Under 11 U.S.C. § 330 (the "Guidelines"). 28 C.F.R. Part 58.*<sup>4</sup> *See also In re SonicBlue*  
14 *Inc.*, 2006 WL 2067882, at \*8 (Bankr. N.D. Cal. July 24, 2006); *Sousa v. Miguel*, 32 F.3d  
15 1370, 1374 (9th Cir. 1994). After accounting for this voluntary reduction, the Application now  
16 requests a total of \$1,390,556.25 in legal fees and \$4,225.60 in expenses. *See* ECF No. 1547.  
17 The United States Trustee does not object to the reasonableness of this Application in the  
18 reduced amount.  
19

20  
21         8.       Debtors' special real estate counsel, SSL Law Firm LLP, has consented to a  
22 voluntary reduction of \$5,607.50 in legal fees to address various legal service descriptions that  
23 the United States Trustee identified as non-compensable clerical overhead. *See* Guidelines;  
24

25 <sup>3</sup> Except for the reservation of rights set forth in paragraph 5, the United States Trustee does not  
26 oppose the Application filed by Debtors' special investigation counsel, Donald S. Davidson, P.C.  
27 *See* ECF No. 1551.

28 <sup>4</sup> <https://www.justice.gov/ust/fee-guidelines> (last visited July 11, 2025).

1 *Thomas*, 2009 WL 7751299, at \*5 (B.A.P. 9th Cir. 2009); *Welch v. Metro. Life Ins. Co.*, 480  
2 F.3d 942, 948 (9th Cir. 2007). After accounting for this voluntary reduction, the Application  
3 now requests a total of \$463,585 in legal fees and \$363.67 in expenses. *See* ECF No. 1549.  
4 The United States Trustee does not object to the reasonableness of this Application in the  
5 reduced amount.  
6

7 9. Debtors' special litigation counsel, Buchalter, P.C., has consented to a voluntary  
8 reduction of \$1,025.46 in legal fees to address various legal service descriptions that the United  
9 States Trustee identified as relating to the pre-retention period, transitory, block billing, and  
10 vague. *See* Guidelines. After accounting for this voluntary reduction, the Application now  
11 requests a total of \$26,984.54 in legal fees and \$6,172.12 in expenses. *See* ECF No. 1571. The  
12 United States Trustee does not object to the reasonableness of this Application in the reduced  
13 amount.  
14

15  
16 Dated: July 11, 2025

PETER C. ANDERSON  
UNITED STATES TRUSTEE

17  
18 /s/ Jared A. Day  
19 Jared A. Day  
Trial Attorney for the United States Trustee  
20  
21  
22  
23  
24  
25  
26  
27  
28